

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**RENEWAL of OPERATING PERMIT 97OPWE188**

Republic Services of Colorado I, LLC.  
Front Range Landfill  
Weld County  
Source ID 1230246

Prepared by Matthew S. Burgett  
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**I. Purpose:**

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued October 1, 2000, and expired on October 1, 2005. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted September 21, 2004. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

**II. Description of Source**

The Front Range Landfill is classified as a municipal solid waste landfill, which falls under the Standard Industrial Classification 4953. This facility is located at 1830 Weld County Road 5, Erie, Weld County, Colorado. This facility is located in an area designated attainment for all pollutants. This facility is also part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16. However, Regulation No. 7 does not currently include any rules targeting landfills

in the 8-hour Ozone Control Area. There are no affected states within 50 miles of the plant. The following Federal Class I designated areas are within 100 kilometers of the plant: Rocky Mountain National Park and Rawah Wilderness Area.

This source is a municipal solid waste disposal facility accepting non-hazardous solid waste (as defined in 6 CCR 1007-2) and has a projected life of 35 years. The landfill began accepting waste in 1996. Decomposing waste encapsulated within the landfill produces a gas that is primarily composed of methane and carbon dioxide. Emissions of non-methane organic compounds (NMOC), Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) also result from the decomposition of solid waste placed in the landfill. Fugitive particulate emissions are emitted from the following landfill activities: material transfer to and from storage piles, disturbed areas, wind erosion of storage piles, waste dumping, and vehicle traffic on unpaved roads.

Based on the information provided in the renewal application, the source has updated the insignificant activity list, parent company name, and mailing address.

The summary of emissions that was presented in the Technical Review Document (TRD) for the original permit issuance has been modified to reflect the most recent emission factors and emission estimates (based on historic waste acceptance rates).

**Facility-wide emissions are outlined below:**

Pollutant	Potential-to-Emit (tons/yr)	Projected 2007 Actual Emissions (tons/yr)
PM <sub>10</sub>	57.2	26.7
PM	223.7	92.5
VOC	46.7	20.61
HAPs	-	0.35

The potential-to-emit VOC and HAP emissions are calculated from EPA's Landfill Gas Emissions Model (LandGEM). This emission rate is based on the landfill's maximum design capacity. The actual emissions found in the table above are the emissions reported on the most recently submitted APEN.

**Compliance Assurance Monitoring (CAM) Applicability**

The landfill does not utilize a control device, thus CAM does not apply.

### **MACT Applicability**

This landfill is not a major source, is not located at a major source, and does not emit NMOC in excess of 50 Mg/yr. The landfill MACT (40 CFR Part 63, Subpart AAAA) does not apply.

## **III. Discussion of Modifications Made**

### **Source Requested Modifications**

#### **Miscellaneous Requested Permit Language Changes**

- Correct the parent company name.
- Mailing address updated.
- Insignificant activity list updated.

### **Other Modifications**

In addition to the requested modifications, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

These changes are as follows:

#### **Page following Cover Page**

- Monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on the permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).
- Added language specifying that the semi-annual reports and compliance certifications are due in the Division's office by the due date and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

## Section I - General Activities and Summary

- Revised Condition 1.1 to have a more accurate description of the emission sources. In Condition 1.1, a reference to the 8-hr Ozone Control Area was added.
- Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit. In addition, General Condition 3.g (common provisions, affirmative defense) was added as a State-only requirement.
- Minor language changes were made to Condition 3.1 to more appropriately reflect the status of the source with respect to PSD.
- Based on comments made by EPA on another operating permit, the phrase “Based on the information provided by the applicant” was added to the beginning of Condition 4.1 (112(r)).
- Added a “new” Section 5 for compliance assurance monitoring (CAM).
- “Landfill Gas Emissions” is now referred to as “Landfill Gas Generation” in Summary Table 6 and throughout the permit.

## Section II - Specific Permit Terms

### Section II.1: Fugitive Particulate Emissions

- Removed Condition 1.1 from the permit which related to APEN submittal. This Condition is not typically included in Operating Permits.
- The language in Condition 1.2.6 (dust control plan condition) has been slightly modified to require compaction and cover within 24 hours.

### Section II.2: Landfill Gas Generation

- Removed the reference to 39% of the NMOCs considered VOCs from Condition 2.1. This information does not need to appear in the permit condition.
- Added language to require annual compliance with the VOC emissions via EPA’s LandGEM or AP-42 2.4. This is consistent with other recently

issued Operating Permits for landfills. It should be noted that the source only needs to use the NSPS default parameters for the NSPS required calculations. Other Division approved factors can be used to show compliance with the annual VOC limit, for example.

- Modified the NSPS WWW, and Regulation No. 6, Part A, Subpart A, General Provisions language to be consistent with other recently issued Operating Permits for landfills (Conditions 2.4 & 2.5).
- Added language to Condition 1.1 to make it clear that annual emission estimates of VOC, NMOC, and HAPs are required.
- Added Condition 2.2.2 to clarify that the amount of petroleum contaminated soil must be recorded on a monthly basis.

### Section III – Permit Shield

- The citation in the permit shield was corrected.

### Section IV - General Conditions

- Added language from the Common Provisions (new condition 3). With this change the reference to “21.d” in Condition 20 (prompt deviation reporting) will be changed to “22.d”, since the general conditions are renumbered with the addition of the Common Provisions.
- Removed the upset and breakdown provisions from Condition 4 (emergency provisions) since they are included in the Common Provisions.
- The citation in General Condition 16 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from “Reg 1” to “Reg 9”.

### Appendices

- Appendix B and C were updated to the current version (9/20/05).
- Appendix F was cleared.